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11 Attorneys for Defendant, COUNTY OF SAN BERNARDINO,  
12 ROBERT VACCARI, and JAKE ADAMS

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14 **UNITED STATES DISTRICT COURT**  
15 **CENTRAL DISTRICT OF CALIFORNIA**

16 L.C., a minor by and through her  
17 guardian *ad litem* Maria Cadena,  
18 individually and as successor-in-interest  
19 to Hector Mr. Puga; I.H., a minor by  
20 and through his guardian *ad litem*  
21 Jasmine Hernandez, individually and as  
22 successor-in-interest to Hector Mr.  
23 Puga; A.L., a minor by and through her  
24 guardian *ad litem* Lydia Lopez,  
25 individually and as successor-in-interest  
26 to Hector Mr. Puga; and ANTONIA  
27 SALAS UBALDO, individually,

28 Plaintiffs,

vs.

29 STATE OF CALIFORNIA; COUNTY  
30 OF SAN BERNARDINO; S.S.C., a  
31 nominal defendant; ISAIAH KEE;  
32 MICHAEL BLACKWOOD;  
33 BERNARDO RUBALCAVA;  
34 ROBERT VACCARI; JAKE ADAMS;  
35 and DOES 6-10, inclusive,

36 Defendants.

37 CASE NO. 5:22-cv-00949-KK-(SHKx)

38 *Assigned for All Purposes to:*  
39 *Hon. Kenly K. Kato – Courtroom 3*

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41 **DECLARATION OF SHANNON L**  
**GUSTAFSON IN SUPPORT OF**  
**OPPOSITION TO PLAINTIFF'S**  
**MOTION IN LIMINE #2 TO**  
**EXCLUDE DRUG AND ALCOHOL**  
**HISTORY OF DECEDENT**

42 Date: May 15, 2025  
43 Time: 9:30 a.m.  
44 Courtroom: 3

45 Trial Date: June 2, 2025

46 *Complaint filed: 06/07/2022*  
*FAC filed: 10/18/22*  
*SAC filed: 01/13/23*  
*TAC filed: 05/12/23*

**DECLARATION OF SHANNON L. GUSTAFSON**

1 I, Shannon L. Gustafson, do state and declare as follows:  
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3 1. I am an attorney at law duly licensed to practice before this Court and am a  
4 shareholder in the law firm of Lynberg & Watkins, P.C., attorneys of record for  
5 Defendants County of San Bernardino, Robert Vaccari, and Jake Adams in the above-  
6 captioned matter. I have personal knowledge of the facts stated herein, except those  
7 stated upon information and belief, and as to those matters, I believe them to be true.  
8 If called upon to testify to the matters herein, I could and would competently do so.

9 2. Attached hereto as Exhibit "1" is a true and correct copy of the relevant portions  
10 of Jasmine Hernandez' deposition.

11 3. Attached hereto as Exhibit "2" is a true and correct copy of the relevant portions  
12 of Maria Cadena's deposition.

13 4. Attached hereto as Exhibit "3" is a true and correct copy of the relevant portions  
14 of Lidia Lopez's deposition.

15 I declare under penalty of perjury under the laws of the United States that the  
16 foregoing is true and correct. Executed this April 24th, 2025, at Orange, California.

17 */s/Shannon L. Gustafson*  
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19 Declarant  
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